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May 22, 2023

Via ECF:

The Honorable Gabriel W. Gorenstein, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMORANDUM ENDORSED

Re: Figuro v. Portx Inc., et al.
Civil Docket No.: 22-cv-06185-GWG

Dear Judge Gorenstein:

This office represents Plaintiff Jean C Figuro ("Plaintiff") in this action, and we respectfully submit this joint letter motion, to respectfully request an adjournment of the parties' upcoming status conference set for May 29, 2023 at 04:00 PM before Judge Gregory H. Woods, as well as the parties' deadline to file a joint letter updating the Court on the status of the case, as explained below.

On August 17, 2022, the Court entered an Order directing, *inter alia*, that a status conference is set for May 29, 2023 at 04:00 PM before Judge Gregory H. Woods. *See* Dkt. No. 11. October 17, 2022, the parties consented to Your Honor's jurisdiction over this matter. *See* Dkt. No. 17.

The reason this adjournment request is being made, is that May 29, 2023 is next Monday, which falls on Memorial Day holiday. As per our conversations with defense counsel, he stated that he will be available for a date in July. Therefore, at the request of both parties, we ask that the court adjourn the in-person conference in this matter until a date in July, convenient for the Court.

We also respectfully request an adjournment of the parties' deadline to file a joint letter updating the Court on the status of the case, until one (1) week before the new adjourned conference date.

Granting this request will also permit the parties ample time to complete discovery and conduct further good faith settlement discussions on this matter.

As stated above, we met and conferred with Defendants prior to filing of this letter, and they consent to the relief sought by this letter, an adjournment of the parties' upcoming

status conference set for May 29, 2023 at 04:00 PM before Judge Gregory H. Woods, and the filing of a joint letter apprising the Court on the status of the case.

We thank the Court for its kind consideration on this matter, and we remain available to provide any additional information necessary to adjourn the May 29, 2023 conference.

Respectfully submitted,

Roman Avshalumov
Roman Avshalumov, Esq.

CC:

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ATTORNEY TO BE NOTICED FOR DEFENDANTS

Paragraph 5 of Docket # 18 vacated the requirement to file a joint letter. The Order was intended also to cancel the conference on May 29 but it contains a typographical error. The next deadline in this case is the deadline to file a letter requesting permission to make a summary judgment motion, which was yesterday. Construing this letter as a request to extend that deadline, the request is granted. The deadline to file any letter requesting permission to make a summary judgment motion is extended to July 7, 2023.

So Ordered.

Gabriel W. Korenstein
GABRIEL W. KORENSTEIN
United States Magistrate Judge

May 23, 2023